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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, NE
ATLANTA, GEORGIA 30365

4783

SEP 01 1994

4WD-SSRB

Jeff D. Wyatt
Senior Environmental Engineer
Chevron Chemical Company
6001 Bollinger Canyon Road
San Ramon, CA 94583-0947

SUBJ: EPA Review
Draft Feasibility Study (FS)
Chevron Chemical NPL Site - Orlando, FL

Dear Mr. Wyatt:

Enclosed please find the initial EPA review comments regarding the document noted above. Additional comments may be forthcoming from the State of Florida and will be transmitted to you as soon as possible. Please revise the document as indicated by the enclosed comments.

For your information, the draft Baseline Risk Assessment is currently being revised by EPA. I hope to send you the revised document during mid-September. If you have any questions, please contact me at (404) 347-2643, ext. 6241.

Sincerely,

Randy Bryant

Randy Bryant
Senior Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Susan Tobin, TASK Environmental

ENCLOSURE
EPA REVIEW COMMENTS ON DRAFT FS REPORT
CHEVRON CHEMICAL NPL SITE

1. Section 1.3.3.2: The COCs should be reviewed to ensure consistency with the Risk Assessment.

Also, given the available documentation, it is unlikely that the presence of benzene is the result of off-site sources. Either submit definitive information or delete the last two sentences of the second paragraph.

2. Section 2.2.2: Soil cleanup levels should be developed that consider the potential for leaching of soil contaminants to groundwater.

Also, this and other sections of the FS should be consistent with the Baseline Risk Assessment. The Risk Assessment is currently being revised by EPA.

3. Section 2.2.2.1 (and Table A-3): Please correct the groundwater ARARs as necessary:

Contaminant	Federal MCL (ug/l)
Chloroform	100 (total trihalomethanes)
DEHP	6
1,2-dichlorobenzene	75
1,2-dichloropropane	5
PCBs	0.5
1,2,4-trichlorobenzene	70
Toluene	1,000

The lindane MCL was finalized in 01/91.

4. Section 2.2.2.2: The last sentence in the first paragraph and the partial quote from the preamble to the NCP should be deleted. Also, delete the second paragraph. The Risk Assessment will address these concerns; the FS should then present appropriate remedial alternatives.
5. Section 2.3.1: Was the volume of contaminated groundwater calculated by multiplying areal extent x aquifer thickness x porosity? If so, the volume of groundwater that exceeds RAOs should be 1,814,400 ft³.

Also, this section should discuss any remnants of the floating petroleum layer (LNAPL) that may be present in the shallow aquifer. If such LNAPLs are present, then appropriate remedial alternatives should be developed.

6. Section 2.4.2: One of the factors that favor the use of containment is an aquifer that is naturally unsuitable for consumption (e.g., Class III aquifers).

EPA REVIEW COMMENTS ON DRAFT FS REPORT (cont.)
CHEVRON CHEMICAL NPL SITE

7. Section 3.2.2: The first sentence of the first paragraph and the second sentence of the second paragraph seem to contradict one another.

Also, it is likely that all contaminants of concern would be sampled as part of the long-term monitoring program.

8. Section 3.2.2.3: Table 3-1 describes the impact of the alternatives upon plume size, not costs.
9. Section 3.2.3.2: Onsite discharge of treated groundwater was a component of the previous removal action at the Site. Also, it seems unlikely that an active pump treat system would require an "excessive" amount of time to reach RAOs, especially when compared to natural attenuation.
10. Figure 3-5: This figure indicates that concentrations of alpha-BHC may discharge to Lake Fairview at levels of 0.05 ppb. Please clarify if this is actually expected to occur now or in the near future.
11. Section 3.2.6.1: Provide further discussion of the assumption that oxygenated conditions would be established across the entire COC plumes. Also, has the locations of the sources been identified?
12. Section 3.3: In situ physical treatment may be necessary for any remaining LNAPLs or localized hydrocarbon groundwater contamination. Therefore, such treatment should be retained for detailed analysis.

Also, Table 3-8 was not included in the report.

13. Section 4.2.1, Compliance with ARARs: The phrase several tens of years should be replaced with some numerical range of years, e.g., 20-50 years. This change should be made in other sections of the report, where appropriate.
14. Section 4.2.3, Overall Protection of Human Health and the Environment: If air emissions are expected to present an unacceptable threat, then air emission controls should be included as part of this alternative.

Also, under compliance with ARARs, it seems unlikely that active groundwater remediation will take as long to complete as natural attenuation.

15. Appendix B: Delete this appendix. Similar material may be submitted in a separate letter, if so desired.